

FILED 29 FEB '16 11:55 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

Robert Craig Woodroffe,

(Enter full name of plaintiff(s))

V. Plaintiff(s),

State of Oregon, Ellen Rosenblum, Shannon Vincent,
Victor Beerbaum, Collette Peters, Michael Gower,
John Myrskis, Jill Lurtis, Capt Pedro, Capt Eversum,
Capt Lytle, Lt BA Young, Lt Boston, Lt Evison,
Sgt Hago, Sgt Hawkins, Sgt Primmer, Cpl Ransier,
Lt McMillin, Ms Hillmick, Ms Short, Michael Mahoney,
Robert H. Bingham, Jr. ~~(Enter full name of each defendant(s))~~
DR Stellan, James Seaton, Capt Wilson, Edward Williamson,
Dwayne Green,
Defendant(s). are sued in
individual and official capacities

Civil Case No. 2:15-cv-02390-SB

(to be assigned by Clerk of the Court)

second amended verified complaint
PRISONER CIVIL RIGHTS
COMPLAINT

[JURY TRIAL REQUESTED]

I.

A. Have you brought any other action or appeal in a court of the United States while a prisoner?

Yes ☒

No ☐

B. If your answer to A is yes, how many? 3. Describe the lawsuit(s) in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiff(s): Robert Craig Woodroffe

1 Previous lawsuit

2

3 Plaintiff: Robert Woodroffe

4 Defendants: State of Oregon et al.

5 Court: US District Court - Portland

6 Docket number: 2:12 CV00403-SI

7 name of judge: Michael Simon

8 Disposition: Judge Simon gave plaintiff

9 30 days to amend complaint, and I got

10 transferred from SREI to TRII and DOE

11 lost my amended complaint, and court

12 denied me to rewrite it, so it was

13 dismissed and DOE is now named in this

14 suit on it for damage as to its loss.

15

16 In 1996 I think it was I filed a suit

17 which was dismissed I got no information

18 on it

19

20

21

22

23

24

25

26

Defendant(s): State of Oregon et al

2. Court: US District Court
3. Docket Number: CV 00977-mo
4. Name of judge to whom case was assigned: Moseman
5. Disposition (Was the case dismissed? Was it appealed? Is it still pending?)

State of Oregon settled once judge confirmed deliberate indifference I dismissed Appeal, and District case one to settlement?

6. Approximate date of filing: _____
7. Approximate date of disposition: 2008

II.

A. Place of confinement: Two Rivers Correctional facility

B. Is there a prisoner grievance procedure in this institution?

Yes ☒

No ☐

C. Have you filed a grievance concerning the facts relating to this complaint?

Yes ☒

No ☐

If your answer is no, explain why not:

D. Is the grievance process completed?

Yes ☒

No ☐

III. PARTIES

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff: Robert Craig Woodruffe
 Security Identification No.: 3631215
 Address: 82911 Beach Access Rd.
Umatilla, Oregon 97882

(In item B, place the full name of each defendant, his/her official position, and his/her place of employment.)

B. Defendant Ellen Rosenblum is employed as Attorney General
 at 1162 Court St. NE Salem Oregon 97882

Defendant Shannon Vincent is employed as Asst Attorney General
 at 1162 Court St. NE Salem, Oregon 97882

Defendant Victor Bearbowen is employed as Corporal TRC
 at 82911 Beach Access Rd Umatilla, Oregon 97882

Defendant Collette Peters is employed as Director of DOC
 at 2575 Center St NE Salem, Oregon 97301

Defendant Michael Gower is employed as Asst DOC Director
 at 2575 Center St NE Salem, Oregon 97301

Additional defendants: John Mayrick - TRC Superintendent
82911 Beach Access Rd Umatilla Oregon 97882
See attached

Defendant.

1 Bill Curtis is employed as exec asst to Supt.
2 at 777 Stanton Blvd. Ontario Oregon 97914

3
4 Defendant Capt Pedro is employed as a Captain
5 at 82911 Beach Access Rd Umatilla, Oregon 97882

6
7 Defendant Iverson is employed as a Captain
8 at 82911 Beach Access Rd Umatilla Oregon 97882

9
10 Defendant Lytle is employed as a Captain
11 at 82911 Beach Access Rd Umatilla Oregon 97882

12
13 Defendant Lt. RA. Young is employed as a Lieutenant
14 at 82911 Beach Access Rd Umatilla Oregon 97882

15
16 Defendant Lt Boston is employed as a Lieutenant
17 at 82911 Beach Access Rd Umatilla Oregon 97882

18
19 Defendant Lt. Edison is employed as a Lieutenant
20 at 82911 Beach Access Rd. Umatilla Oregon 97882

21
22 Defendant Sgt Haga is employed as a Sergeant
23 at 82911 Beach Access Rd. Umatilla Oregon 97882

24
25 Defendant Sgt Hoskins is employed as a Sergeant
26 at 82911 Beach Access Rd Umatilla Oregon 97882

1 Defendant Sgt. primer is employed as a Sargent
2 at 82911 Beach Access Rd Umatilla Oregon 97882

3
4 Defendant c/o Ransier is employed as a officer
5 at 82911 Beach Access Rd Umatilla, Oregon 97882

6
7 Defendant Lt. McMullen, is employed as a Lieutenant
8 at 82911 Beach Access Rd Umatilla, Oregon 97882

9
10 Defendant R. Hillmick was employed as a Grievance Word,
11 at 82911 Beach Access Rd. Umatilla, Oregon 97882

12
13 Defendant ms Short is employed as a SIM Inspector,
14 at 82911 Beach Access Rd Umatilla - Oregon 97882

15
16 Defendant Michael Mahoney is employed as a Lawyer
17 at 280 A. Street E. P.O. Box 220 Vale, Oregon 97882

18
19 Defendant Robert H. King Jr. is an inmate incarcerated
20 at 2605 State St. Salem, Oregon 97810

21
22 Defendant Dr. Sikelos is employed as a ^{medical} Director
23 at 2575 Center St. Salem - Oregon 97310

24
25 Defendant Dr. Norton is employed as a TRCA Doctor
26 at 82911 Beach Access Rd Umatilla Oregon 97882

1 Defendant James Deacon is employed as a hearing officer
2 at 82911 Beach Access Rd Umatilla Oregon 97882

3
4 Defendant Sgt Wilson is employed as a Sergeant
5 at 82911 Beach Access Rd Umatilla Oregon 97882

6
7 Defendant Leonard Williamson was inspector General
8 at 2575 Center St. Salem Oregon 97301

9
10 Defendant Dwayne Green is employed as a Das Supervisor
11 at 1225 Larry St N150 Salem Oregon 97301

12
13 Plaintiff made a Bonafide effort to resolve
14 all claims with above defendants

15
16 Plaintiff exhausted Grievances on all claims
17 all levels.

18
19 Plaintiff filed timely but claims on all
20 claims

21
22 Plaintiff has complied with the PLRA
23 as to exhaustion

IV. STATEMENT OF CLAIM

Claim I

State what right under the Constitution, laws, or treaties of the United States has been violated.

1st Amendment Retaliation to US Constitution
for speech, conduct, and action violating this
Right.

Supporting Facts: (State here as briefly as possible the facts of your case. Describe how each defendant is involved and when the conduct occurred. It is not necessary to give any legal arguments or cite any cases or statutes.)

1. Ellen Rosenblum Received 2 letters on Shannon Vincent Retaliating on plaintiff abusing her position from plaintiff and allowed it to continue ignoring plaintiff's letters to her
2. Ellen Rosenblum knew and was aware of Retaliation by Shannon Vincent over filing a perjured Declaration by Victor Beerbower, -POC.
3. Shannon Vincent on 11-23-15 acted with malice to harm and retaliate against plaintiff for his civil action by intentionally and knowingly filing a unlikely perjured Declaration by Victor Beerbower, over a 13 inch TV.
4. Victor Beerbower on 3-17-14 wrote a fraudulent false misconduct which was dismissed
5. Victor Beerbower seen plaintiff later after dismissal and said plaintiff got a free one (See claim 1 attachments)

Claim II

State what right under the Constitution, laws, or treaties of the United States has been violated.

Conspiracy to commit 1st Amendment Retaliation

Supporting Facts: (State here as briefly as possible the facts of your case. Describe how each defendant is involved and when the conduct occurred. It is not necessary to give any legal arguments or cite any cases or statutes.)

66. Sherman Vincent and Victor Beertbauer conspired together in drafting a Declaration to be used in state court under fraud and perjury to mislead a court out of retaliation.
67. Colette Peters, Michael Bower, John Myrick, Capt Pedro, Capt Bower, Capt Lytle ~~and~~ were all aware up and conspired with each other to punish plaintiff for litigation pending on them out of retaliation and never any evidence to support misconduct.
68. Lt Bower conspired with Bobby King Wilson to directed him to draft a written Report on plaintiff to get sent to SHH.
- See Attached for claim 2

Claim III

State what right under the Constitution, laws, or treaties of the United States has been violated.

8th Amendment Cruel and unusual punishment
Failure to protect, Deliberate indifference.

Supporting Facts: (State here as briefly as possible the facts of your case. Describe how each defendant is involved and when the conduct occurred. It is not necessary to give any legal arguments or cite any cases or statutes.)

76. Michael Bower Recieve Several Kites and letters as inmates and staff retaliation on putting plaintiff in segregation with no evidence.
77. Capt. Pedro knew Chuck Reese was a violent person and sexual predator and kept in multiple shifts and left in an AD seg protective custody and resulted in plaintiff being attacked by him on 5-22-14
78. Capt Pedro was Security Capt and had a Duty

to protect plaintiff from harm
 29 Capt Peters knew the Keokuk area was used for
 sightseeing under breaking rules as the only
 place other than Shawnee that is no longer's
 30. Sgt. Hays had a duty to put camera in Keokuk
 area to assure safety on AP Sgt. Hays

(If you have additional claims, describe them on another piece of paper, using the same outline.)

V. RELIEF

State briefly exactly relief you are seeking. Make no legal arguments. Cite no cases or statutes.

Claim one - 1st Amendment Retaliation

- A. Compensatory Damages jointly and severally for 15,000⁰⁰
 against Ellen Rosenblum, Shannon Vincent, and
 Victor Beerbower for 1st Amendment Retaliation over
 civil litigating sitings
- B. Compensatory Damages jointly and severally for 20,000⁰⁰
 against Colette Peters, Michael Gower, Capt Peters, Capt

Signed this 23 day of February, 2016.

Robert Woodhuffe

Robert Woodhuffe
 (Signature of Plaintiff(s))

- 1 b. Victor Beerhauer due to past History Retaliated on
2 plaintiff by supply Shannon Vincent a perjured
3 Declaration to Dismiss TX. lawsuit case No. 81406779
4 on 11-18-13
- 5 7. Collette Peters Received several kites and letters
6 from plaintiff on staff and inmate Retaliation and
7 continued to Refer to John Myrick who did nothing
8 8. Collette Peters knew Referring kites or letters would
9 Result in No Resolution or fix problem.
- 10 9. Collette Peters Received a kite on 1-7-14 complaining
11 of sales charges, and segregation with No evidence and
12 and nothing to Resolve it
- 13 10 Collette Peters Received a kite on 2-9-14 over
14 kept 2 weeks and again on 2-1-14 over placing plaintiff
15 on lock down over false allegations with No evidence
- 16 11. Collette Peters knew plaintiff was being set up by
17 staff and inmates on a Regular Basis and allowed it
18 to happen
- 19 12. Michael Gower knew staff and inmates were
20 Retaliating against Plaintiff and let it continue
21 for past 2 years to Date.
- 22 13. Michael Gower Received kites of Harassment and
23 Retaliation on 1-16-14, 1-7-14, 3-13-14, 11-18-13,
24 1-9-13, and others and let TREC continue to do it
- 25 14. Ryan Larson wrote Michael Gower over inmates
26 trying to Pay him to plant a weapon on plaintiff.
on 6-11-14

1 15. in past 2 years plaintiff has Received 7 misconducts
 2 with zero evidence with most being dismissed by Defendants
 3 16. plaintiff has been placed on Pen No Evidence
 4 on investigation several times by Defendants
 5 17. Shannon Vincent Retaliated knowingly when SHe Abused
 6 position in Siling Grievance nation to Revoke after prior
 7 Ruling by judge find over claim plaintiff was it.
 8 and filed suit in maricopa County to manipulate
 9 judge Hill and Succeeded, 4 cases were dismissed
 10 18. Mr myrick was made aware multiple times of
 11 inmate King and other staff set plaintiff up and
 12 Retaliated by using King to manipulate inmates
 13 19. Jill Curtis due to his grievance and civil litigation
 14 delay investigations as to property torts hinder investigations
 15 20. Jill Curtis was Responsible for holding plaintiff's
 16 property upon transport from state to TREC and
 17 Federal case 2:12 CV00403-SI was in a legal title
 18 of legal property that was lost and documented
 19 21. Jill Curtis Retaliated when SHe had a used TV.
 20 sent to TREC which was to be new and violated
 21 a court order to Retaliate on plaintiff to harm
 22 him for his actions
 23 22 Jill Curtis was in charge of investigations of
 24 torts and grievance on property and denied plaintiff
 25 due process and Resolution even though evidence
 26 exhibited to prove plaintiff's claims

1 23. Jill Curtis was the Prison plaintiff. case
 2 was not accepted and on 1-15-14 could not
 3 correct her wrong when she lost his complaint
 4 24. Capt Pedro knew Bobby King paid inmates
 5 to set people up including plaintiff and did
 6 Nothing

7 25. Capt Pedro knowingly knew on 1-31-14 that is
 8 on camera and that King offered Douglas Mosler
 9 \$500⁰⁰ to make a false state and made a memo
 10 on it and let King get away with it.

11 26. Capt Pedro intended on 1-31-14 to put plaintiff
 12 in seg if Mosler would at cover King story
 13 so he could Retaliate

14 27. on 2-24-14 Capt Pedro has Sgt. Roberts prior
 15 to above matter have plaintiffs cell trashed
 16 per statements by Robert King and Retaliated
 17 together to set me up.

18 28. Capt Pedro's treated plaintiff with less equal
 19 treatment due to torts, grievance and civil actions
 20 and placed him in Segregation with no evidence

21 29. on 5-17-14 Capt Pedro knew Chuck Reese
 22 was paid by Robert King to assault plaintiff
 23 and knew plaintiff did not fight back and a
 24 broken nose again and beat up badly all photographed
 25 and still put Plaintiff in seg though its common
 26 not to do so.

1 30 Capt Pedro had plaintiff put in seg with
2 Chuck Reese on 5-22-14 in DR 1405 N. 105 N 25
3 on false charges

4 31. Capt Pedro had Chuck Reese written up
5 for lower Department Assault III when it classified
6 as a I, then put him back on unit with plaintiff

7 32. Capt Iverson on 2-9-14 after being released
8 from Segregation from false allegations No charges
9 for some thing call Restrict ~~plaintiff~~ plaintiff
10 with no evidence,

11 33. Capt Iverson wrote a memo to deny & Restrict
12 without any due process would not have dayroom
13 or recreation for a month over a false pre
14 ~~report~~ report which was already established to
15 be false.

16 34. Capt Iverson Based on inmate hearsay on 1-27-16
17 places plaintiff in Segregation on No evidence,
18 and took over to his property with No due process,

19 35. Capt Iverson on 2/18/16 came to cell to see
20 plaintiff's caddy, but told plaintiff he would see
21 him and would not like what he would tell
22 plaintiff.

23 36 Capt Lytle Signed a Misconduct Report on 11-17-13
24 on extortion and disrespect DR case NO ~~1311~~ 1311
25 N. 129 N 25 which involved filing a tort claim
26 and wrote him up and put him in seg for this

1 37. on DR 1311 N 129 N25 by Lytle and young
2 Superintendent signed off on orders of Disrespect
3 and Extortion.

4 38. Capt Lytle and Lt young conspired together
5 on this misconduct 1311 N 129 N25 for plaintiff
6 filing a tort claim and why Lt. capt called
7 to oic office at 10 pm at night to yell at
8 him

9 39. Capt Lytle in a Kite Dated 11-19-13 confirms
10 He was present with Lt. young pulling me off and
11 Seq to yell at me for filing a tort, and Dr
12 confirms it.

13 40. Capt Lytle in a Kite 12-15-13 you can tell is
14 still Angry with plaintiff

15 41. Lt young adds Disrespect to his Extortion
16 misconduct 1311 N 129 N25, but also Reads in Dey
17 intake worksheet it was solely extortion & only.

18 42. Capt Lytle on 1-22-16 pull plaintiff into office
19 with Lt young present and says he can put
20 me in Seq on investigation anytime he wants
21 with out any reasons for 30 days and that
22 plaintiff better stop his Actions,

23 43. Capt turns out of no where places
24 plaintiff in Segregation on 1-27-16 No charges
25 on investigation

26 44. Lt RA young on 1-15-16 makes a fake Report

1 to superintendent as to plaintiff over misconduct
 2 1511 TRER 0097 TRER 25 Date of hearing 12-18-15
 3 and made false statements to discredit plaintiff.
 4 45. Lt Boston placed plaintiff in Segregation on
 5 No evidence on 12-18-13 out of Retaliation
 6 and malice intent
 7 46. Lt Boston had Cpl grand ~~that~~ face all
 8 plaintiff property and legal work out of Retaliation
 9 47. Lt Boston,
 10 48. Lt Boston was told by multiple inmates ~~that~~
 11 that press Report was false that Robert King paid
 12 meVae to make false Report
 13 49. Lt Boston sees plaintiff in December 2013
 14 and said 3 inmate informants were not Reliable
 15 and gave conflicting statements.
 16 50. Lt Boston told inmate King in ^{late} December 2013
 17 that he needed him to write a conflict Report
 18 for meVae and done in King's Handwriting.
 19 51. Lt Boston wrote plaintiff a misconduct for
 20 giving a inmate a Declaration.
 21 52. Lt Boston has signed off on multiple misconducts
 22 and investigation to plaintiff in seg with no
 23 evidence or and only inmate hearsay, and not
 24 a threat to safety or security
 25 53. on 4-13-15 via Morgan on misconduct
 26 per Cpl Boston confiscated several legal envelopes

1 under plaintiff's legal work
 2 54. Lt edwards Retaliated on plaintiff when he
 3 knowing made a false Report to Risk management
 4 in 2 property matters to cover up sgt
 5 primmer making false statements in a investigat-
 6 ion which Substantial evidence ~~exists~~ exists
 7 55. sgt primmer Retaliated on plaintiff to
 8 deprive him of his property and deny due
 9 process.
 10 56. In Sep in December 2013 on investigation
 11 c/o Ransier came to plaintiff's cell and told
 12 him that King is going to put the nails
 13 in the coffin on the prea matter and
 14 walked away laughing.
 15 57. c/o Ransier has been investigated multiple
 16 times due to staff and inmate Reports
 17 of misconduct.
 18 58 c/o Ransier was King go to guy when
 19 he wanted to do underhanded things on
 20 plaintiff.
 21 59. Robert King had inmate Staff Relationships
 22 with c/o Ransier, Lt. Boston, Capt pedro, c/o
 23 Carter.
 24 60 ms Short knew she could not write up
 25 plaintiff for civil litigation and did so in
 26 misconduct on 7-23-2014 case No 1406 N.204
 N-25 which was dismissed with prejudice

1 which was done out of Retaliation.
 2 Lt. Michael Mahony put me, Stuart up to writing
 3 up plaintiff on a false misconduct over civil
 4 litigation paid for by Robert King Jr.
 5 b2 Robert King Jr. Retaliated against plaintiff
 6 by paying inmates & staff to do his bidding
 7 and has tried twice now to get plaintiff false
 8 criminal charges.
 9 b3. ~~on~~ Sgt Hagan on 11-22-16 for Lt Young and
 10 Capt Lytle filed a false misconduct based on
 11 zero evidence and no investigation as camera's
 12 would of proved innocence.
 13 b4. Dr Norton Retaliated on plaintiff when he
 14 failed to treat plaintiff with adequate medication
 15 for his coxey's and knee's after seeing a specialist
 16 prior saying signing up for sick call is a waste
 17 of time.
 18 b5 Collette Peters, Michael Gower John Myrick
 19 Capt Pedro, Capt. Duveen, Capt Lytle Lt Young
 20 Lt Boston all put plaintiff in Segregation
 21 on inmate hearsay, NO evidence multiple
 22 times in violation of 1st amendment rights for
 23 grievance, torts, civil Actions
 24
 25
 26

- 1 69. Sgt primer, and Lt edison with Linda schuff
- 2 conspired together to cover up Sgt primer
- 3 committing official misconduct and filing false Reports
- 4 70. Michael mahony conspired with Robert King
- 5 to get ms skurt to write plaintiff up on a
- 6 ~~Severe~~ Level 1 misconduct on 7-23-14,
- 7 71. Michael mahony admitted Robert King paid
- 8 him to go after plaintiff as it was stated in
- 9 misconduct that King paid mahony, which
- 10 ms skurt wrote up
- 11 72. Mr Green was send proof that investigation
- 12 by TRST was tampered with and evidence was
- 13 not supplied by edison and he did nothing
- 14 knowing plaintiff had a claim based on
- 15 staff witnesses and proof of corruption.
- 16 73. ms skurt, mike mahony and Robert King
- 17 working together to plan a Retaliation on
- 18 plaintiff for legal civil litigation violated
- 19 his protected Rights
- 20 74. Sgt Wilson used inmates with documented
- 21 false report to staff in misconduct when he
- 22 used inmate ~~past~~ Dustin Westling, and Craig
- 23 Cruz, and there friends to set plaintiff up
- 24 on a false misconduct in case 1507 n012 n 25
- 25 dated 7/14/15
- 26 75. Robert King was kicked out of TRST
- for manipulation of staff and in-mates.

1 81 Capt Pedro placed plaintiff in Segregation on 5/17/14
 2 When he was a victim of assault by attack
 3 from behind and by unprovoked assault by Chuck
 4 Reese, punishing him for being beat up.

5 82 Lt Boston was in violation of plaintiff's rights
 6 to protect him multiple times from inmates
 7 setting him up and placing him in segregation
 8 for no reason or evidence other than hearsay.

9 83 Robert King conspiring with Lt Boston to put
 10 in Segregation in December 2013 than January 2014
 11 were cruel and unusual punishment.

12 ~~84. Dr Norton told plaintiff here at TREX~~

13 ~~that he will not get medications requested~~

14 84. Dr Norton told plaintiff here at TREX
 15 that he will not get medications requested
 16 by specialist and plaintiff is wasting his time
 17 for sick call regardless of pain.

18
 19 Claim IV 14th Amendment denial of Due
 20 Process

21 85. Shannon Vincent Denied Due process when
 22 she knowingly lied to Judge Hung in case No
 23 1406779 to Claim IV was true when she
 24 knew it was not.

25 86. Shannon Vincent Denied Due process by
 26 knowingly filing a Declaration by Victor

- 1 Bearbowen knowing contents was perjury and
 2 false and used to deprive plaintiff and mislead
 3 the court.
- 4 87. Shannon Vincent had plaintiff exhibits which
 5 proved T.O. was used yet went out of her
 6 ~~own~~ way and abused her position by mis leading
 7 the court to deprive plaintiff her T.O.
- 8 88. Shannon Vincent knew she was denying
 9 Victor Bearbowen Declaration Day prior to
 10 court knowing plaintiff would not see her
 11 reply or Declaration which violated OROP and
 12 Court Rules.
- 13 89. Victor Bearbowen violated plaintiff due process
 14 by committing perjury in Declaration dated
 15 11-18-15 with his multiple false statements
 16 and court used in order to dismissed as
 17 mention so.
- 18 90. R. Hillmick denied due process when he
 19 denied to process 17 grievances in the past
 20 2 years.
- 21 91. Jill Curtis denied due process in grievance
 22 2013-08-086 involving property she was
 23 liable for and made false statements in her
 24 investigation, and doing all levels which
 25 violates due process.
- 26 92. Jill Curtis denied due process when she

- 1 lost 3 complaints causing them to be dismissed
- 2 which was his property and Refused to Resolve.
- 3 93. Sherman Vincent manipulated Mr. Bepko
- 4 to make false Declaration in case 12-05-94094
- 5 which Sgt Owers told her was false by phone.
- 6 94. Lt Babin Denied plaintiff due process when
- 7 he Denied to hold Bobby King and Kurtis
- 8 mevas accountable per policy for false prea
- 9 allegations
- 10 95. Capt ~~Travis~~ Trevon denied plaintiff due
- 11 process when he looked him down with
- 12 no evidence Denying Denroom or yard.
- 13 96. Sgt Hage stated in DR Violation on 11-22-15
- 14 that misconduct took place on 11-20-15 yet did
- 15 not view camera to confirm it.
- 16 97. Capt Lytle had Lt Ra young place plaintiff
- 17 in Segregation when camera footage would
- 18 prove innocence or guilt.
- 19 98. James Deacon Denied Due process to
- 20 not have witness spoke to, and to ignore
- 21 evidence of letter by Justin told bragging
- 22 he set plaintiff up for misconduct 1511 TRC
- 23 0097 TRC 25 Dated 12-18-15
- 24 99. Capt Redro failed to timely assign investigation
- 25 in case 1511 TRC 0097 TRC 25 when camera
- 26 footage was proof to prove his innocence

1 and waited for it to be taped over prior
2 to assigning it.

3 100. Lt RA. Young saw evidence of ex
4 Justin Todd bragging on setting up plaintiff
5 with Craig Cruz. Help them lied in his Report
6 knowingly to deny plaintiff due process,
7 101. Capt Iverson copied Justin Todd's letter
8 to plaintiff and letter to Hunter Wilson
9 which Todd admitted plaintiff did not get
10 unduband as accused and who did.
11 and failed to correct DR knowing plaintiff
12 was not guilty.

13 102 James Deagan Denied Due process
14 plaintiff due process due process in hearing
15 No 1507 NO12 N12 Done on 7-14-15 when
16 He Refused witnesses and camera footage
17 for plaintiff of staff and inmate witnesses
18 for an investigation

19 103. James Deagan was made aware He violated
20 Mike Evans in Evans v. Deagan 2015 US
21 District Lexis 6090 on the Record same as
22 plaintiff and still knowingly denied due
23 process to plaintiff

24 104 sherman v. Deagan when she filed a
25 Injunction motion to Revoke fees in order
26 to get plaintiff's property claims dismissed

1 on unstable courts, knowing she knew per judge
 2 Fred Owen's Ruling in malheur courts
 3 on some matter yet knowingly used her
 4 position to manipulate a court judge to
 5 premises claims so he has no one process
 6 to file in state court which are all part
 7 of this case now

8 105 Sgt Wilson failed to do a through investigation
 9 as to medication abuse Dr on 7/2/15 when
 10 he failed to use camera footage to get Justin
 11 Todd and plaintiff passing anything during
 12 month long investigation in case
 13 1507 TRC 0012 TRC 25

14 claim V. Deliberate Indifference to 8th &
 15 Amendment.

16
 17 106 Dr Norton told plaintiff in 2013 that
 18 plaintiff will never get neurontin or tramadol
 19 that specialist have recommended as appropriate
 20 treatment for his conditions coccyx and knees
 21 107 Dr Skilton seen plaintiff at TRC
 22 and said he don't care who time seen
 23 or what specialist said and if plaintiff wanted
 24 medical treatment care then he should of
 25 thought of that prior to filing civil Actions
 26 and grievances against him and is Retaliation.

1 108 Dr. Shelton TIL policy and Review by
 2 him being vet power and hinder doctors
 3 who treat plaintiff to give appropriate
 4 medication due to peer pressure is
 5 deliberate indifference to plaintiff medical
 6 needs for pain and suffering of knees and
 7 coccyx

8 Claim VI- intentional infliction of emotional
 9 distress (IIED)

10
 11 109 Colette Peters failure to hold inmates
 12 accountable per her monthly news-letters that
 13 she would and did not caused plaintiff
 14 panic attacks and Anxiety

15 110. Colette Peters abuse of her position
 16 and Federal Funding to assure press victims
 17 falsely accused accountable for lying on
 18 plaintiff on press matters

19 111 Michael Gower was aware Lt. Boston
 20 had got Robert King to harm plaintiff.
 21 Denying "IIED"

22 112 Lt Boston on several occasions mentioned
 23 in this complaint on him placing plaintiff
 24 wrongly in Segregation and caused plaintiff
 25 panic attacks, Anxiety and fear. caused
 26 "IIED"

113. Robert King Told plaintiff He Runs AHH
 2 meeting staff and inmates and inmates DO
 3 as he says or get same treatment and
 4 this caused plaintiff "TIED"

5 114. Robert King Bregged Repeatedly of his
 6 crimes of murder-for Hire and he has
 7 mafia ties to manipulate inmates to set
 8 plaintiff up caused "TIED"

9 115. Robert King actions forced plaintiff
 10 forced him to get on medication for anxiety
 11 and panic attacks until it was used against
 12 him causing "TIED"

13 116. shannon Vincent using his position to
 14 sway cpl Beerbower into abusing the court
 15 system in giving a untimely perjured
 16 declaration knowing it was found and made
 17 plaintiff look like a liar and not get his
 18 ex. judgment thru Acts of crime caused
 19 plaintiff "TIED"

20 117. ms start in writing a major level 1
 21 Dr. instruction knowing it violates constitution
 22 yet still did it caused plaintiff "TIED"

23 118 Robert King and Michael Mahoney in
 24 conspiring and bring ms start into it
 25 to write a false misconduct caused
 26 plaintiff panic attacks and anxiety

1 and severe "IED"
 2 119. These Defendants named who wrote false
 3 misinterpreted Reports on no evidence and
 4 made hearsay to make plaintiff go
 5 several times in DSH. caused plaintiff
 6 severe "IED"

7
 8 Claims 7 14th Amendment equal protection
 9

10 120. Shannon Vincent thru abuse of her position
 11 with DOJ made it ~~not~~ impossible in Washilla
 12 courts for plaintiff to get due process on any
 13 claim, including property claims. ~~based on fact~~

14 121. Shannon Vincent based on her fraud and
 15 false pretence, plaintiff no longer has due course
 16 or due process as to his property claims
 17 in violation of US Constitution of 14th Amendment

18 122. Shannon Vincent got the attached 4 property
 19 claims dismissed without prejudice based on
 20 false statements to Washilla courts in motion
 21 to Revoke fees under false pretence and perjury.

22 123. Shannon Vincent acted outside the scope
 23 of her position to deny plaintiff 14th Amendment
 24 equal-protection when she knew senior judge
 25 Brad Averna's order and opinion in malheur
 26 courts striking down the motion to Revoke.

1 as not qualify to the laws in place.

2 124. Shannon Vincent filed a motion to Revoke
 3 in malheur and umatilla county, and a Detailed
 4 Decision in malheur showed plaintiff could
 5 not have a strike, yet she continued for it in
 6 umatilla courts. Regardless of malheur Ruling.

7 125. Collette Peters in doc news letters claimed
 8 false press Reports on Retaliation would not be
 9 tolerated, and violator would be held accountable

10 126. Collette Peters knew Robert King paid
 11 Kurtis mevae 120⁰⁰ to make a false press
 12 Report and did not hold King or mevae accountable

13 127. Lt Boston knew King paid Kurtis mevae
 14 120⁰⁰ to make false Reports on plaintiff and
 15 did not hold them accountable

16 128 Michael Gower had a job duty to hold King
 17 accountable for paying Kurtis mevae 120⁰⁰
 18 to make false press Report on plaintiff after
 19 plaintiff made him aware of it

20 129. Lt Young failed to treat me equally when
 21 investigating a tort claim when Lt put
 22 plaintiff in Sec for filing a tort claim
 23 protected by 1st Amendment.

24 130 Capt Pedra as operations Captain of Security
 25 to hold Robert King accountable for making
 26 Kurtis mevae file a false press Report.

1 or doing a investigation
 2 131. Ellen Rosenblum Received 2 letters
 3 from plaintiff over Shannon Vincent Violating
 4 OSB ethic, state laws and Court Rules and
 5 did Nothing and continues to do Nothing still.
 6 132. Plaintiff has a state and federal constitutional
 7 right to litigate his property claims
 8 which Shannon Vincent apt Dismissed unless
 9 he would pay the filing fees.
 10 133. Shannon Vincent violated plaintiff's
 11 14th Amendment equal protection when she
 12 made it where plaintiff could not litigate
 13 his property claims in state court.
 14 134 Plaintiff wrote DOJ fraud Division
 15 Governed by Ellen Rosenblum about Shannon
 16 Vincent's corruption of position when she put
 17 a state employee up to committing perjury.
 18 135. Shannon Vincent knowingly, intentionally
 19 stepped outside the scope of her job in
 20 violating plaintiff equal protection Right
 21 when she violated ethic, laws and constitution.
 22 136 Capt. Iverson on 1-27-16 had plaintiff's
 23 legal work and property mixed up and tossed
 24 and took property with out a stake down
 25 or one process of Anykind.
 26

137, shannon vincent - 001 has left plaintiff with no post

deprivation remedy to property claims, violating 14th Amendment,

~~by multiple grievances and tort claims and objections made to all~~
~~and all was timely filled. RW~~

PLAINTIFFS SUPPLEMENTAL STATE TORT CLAIMS

Claim on-Conversion.

138 ~~202~~ Plaintiff also realleges paragraphs 1 thru 281 as they in part pertain to these claims and apart of them.

139 ~~203~~. State of oregon in state claims are the person to be named in state actions per the OTCA and parties are allowed there rights to resolution for actions done by state employees.

140 ~~204~~. Plaintiff filed a civil action in clackamas as to property lost that was in the prisons postion and control and fee were waived in this case and a change of venue was maliously resuested by shannon vincent.

141 ~~205~~. Umatilla Court by Motion of shannon vincent who minipulated Judge Hill into over a year old case into revoking a filing fee that was granted in vclackamas county.

142 ~~206~~. The Umatilla courts on shannon vincent's motion to dismiss case due to not paying the filing fee denied state and federal constitutional rights on due process.

143 ~~207~~. Sgt. Wodge picked uplaintiffs property and plaintiffs celly and was in comoplete control of it on 10-11-11 and inventoried it and was in possession and TRCI has sole control of plaintiff proper.

144 ~~208~~. No inventtory was done per Division 117 per the rules on property and no proof he did his job after picking it up was available as to palintiffs property.

145 ~~209~~. Plaintiff asked Lt. Mcmillian to look at his property due to possible loss of property on it getting mixed up, but plaintiff was denied.

146 ~~210~~. plaintiff wrote a grievance on being denied to look at his property and or inventory sheet and plaintiff was denied.

147 ~~211~~. Plaintiff wrote a grievance on being denied to look at his property and or inventory sheet and was denied.

148 ~~212~~. Lt. mcmillian knew already that there was property concerns based on alreday mixed up property from that day as several peple got rooled up.

149 ~~213~~. Plaintiff asked to go thur his property to Lt. Mcmillian as he was going to transport and rules allowed it and plaintiff

was told property was in 3 locations which is a violation of its own and should of been in one location per the rules.

150 ~~294~~. Lt. Mcmillian was in possession and had complete control of plaintiffs property and failed to protect it and was supposed to be in a secured area and was not.

151 ~~295~~. Lt. Mcmillian did admit in grievance that plaintiff had 2 large bags of consumable canteen being property bags are 35-50 gallon bags and this did not make it to SRCI in transport so it can't be disputed it did not make it to srci from trci.

152 ~~296~~. Plaintiff made Lt. Mcmillian aware Marcus moores property would all fit in a small bread bag and if he had more then it would be plaintiffs.

153 ~~297~~. Lt. Mcmillian Denied to look into Moores property or inventory sheet prior to his parole.

154 ~~298~~. Lt. Mcmillian in the above grievance also states he found an additional bag of property which had missing envelopes postage pre paid of various sizes which still did not make it to SRCI either and documented as such.

155 ~~299~~. Lt. Mcmillian failed to follow rules OAR 291-117-0110 which states in part a inmate prior to transport to another facility will inventory his property and plaintiff was denied this also.

156 ~~300~~. Lt. Mcmillian did say in a grievance 2011-10-053 and 2011-11-053 that plaintiff will go thru his property upon release from segregation but this did not happen either.

157 ~~301~~. Lt. Mcmillian failed to protect plaintiffs property, failed to properly store plaintiffs property and by own admittance said it was store in 3 locations and failed to assure it was inventoried.

158 ~~302~~. Lt. Mcmillian knew marcus moore had some of his property as he was in blue shorts at r/d intake and did not own them and plaintiff told him he had them and did nothing.

159 ~~303~~. Plaintiff lost 2 art portfolios consisting of over 200 hundred drawing together and put for a card and coloring book for general public and was authorized by doc. to make. valued at 20,000.00 potentially yearly and plaintiff also lost a green photo album with 30 or so cards millions canteen as follows axe body wash, glass case, clear cl 10 headphones, 2 spiral journals, christmas creamer, 2 hygiene bags, 10 soups, 1 popcorn, 1 spring top lotion, 2 pens, 1 cocktail pepperoni, 1 bag nacho chips, 1 keefe marshmallow coco, 1 hot pickle, 1 chilli, 3 packs flour tortillas, 1 bag jolly ranchers 1 container

PAGE 30 AMENDED VERIFIED COMPLAINT.

cherry juice, 1 trail mix, 1 refried beans, 2 strawberry danishes, 2 hot cheetos, 1 pumistone, 1 broken remote, 1 pair glasses, 1 broken cd, 2 bags wippermix, 13 pair of socks, 1 roll mat chess board, 1 prayer rug, 1 thermal mug, 1 shaving brush, 1 tupperware PENCIAL TUB FULL WITH PENCIALS, 1 PAIR WEIGHT GLOVES, 2 DENTURES tubes, 2 pitchers 1 Blue brush stick eraser, 1 kneaded eraser, 1 vinyl eraser, 3 wash rags, 1 pateen shampoo 3in1 shampoo, 4 priority pre paid lope\$6 12 oz envelopes, 2 6x9 envelopes, 2 gel deoderants, 1 Vo5 shampoo, 4 Bottles of vitamins, 2 Tumblers, 8-10 squeeze cheezes, 2 beef sticks, 1 chilli garlic sause, 1 open Barbeque sause, 1 Video game, 1 pair Blue shorts, 1 elder runes, 1 3 ring binder, 1 pad 100 lb paper and misc. open canteen which total 803.38 not including two art portfollio's and all canteen was documented in grienances so it can't be disputed.

160 ~~304~~. SRCI staff in writing admitt there was no inventory with plaintiff property when it showed up.

161 ~~305~~. Grievance mentions 2 large bags of consumable canteen and several envelopes which SRCI also confirms in writing which did not show up at SRCI upon transport.

162 ~~306~~. From 10-11-11 to 2-7-12 Doc/TRCI had full control and possession of plaintiff property and was in there possession when it was lost.

Second converion property claim.

163 ~~307~~. Plaintiff alleges this is also related to denial of due process of the 14th amendment.

164 ~~308~~. State of oregon will claim of tort action for property that they can be the only defendant named for a defendant.

165 ~~309~~. SRCI had property considered "sharps" held in dsu storage to consist of: finger and toe nail clippers, 2 razor handles, 2 packs of blades, 2 pencial sharpners and all this was held by the prison at SRCI and did not make it to me at TRCI.

166 ~~310~~. SRCI-ASU reinventoried plaintiffs property and it clearely shows in the inventory and photos that plaintiff had 3 pair of blue shorts, 1 pair of CL 20's not broken prior to being sent, 1 pair broken glasses but 2 were broken upon being sent to TRCI, and a few dallors of canteen totaling around 400.00 or more.

167 ~~311~~. They Enventoried 7 legal totes with lids and plaintiff's legal work shows up from SRCI to TRCI with 6 bottoms and 7 lids of legal work which included a federal amended complaint, blacks PAGE ~~32~~ AMENDED VERIFIED COMPLAINT.

law dictionary, total value 2,000.00, not counting legal case that was dismissed due to the loss.

168 ~~142~~. C/o Glassey said on 4-24-14 that all ASU property stated in revelient parts were sent to R?D.

169 ~~143~~. Sgt. Brown who did a TRCI invnetory also confirmed glasses being broken in a kite dated 7-6-13.

170 ~~144~~. Sgt. Brown confirms only 6 bottoms and 7 lids show up with property proving a bottom was missing.

171 ~~145~~. There is no way to dispute this loss as plaintiff was not in possession of it when inventoried at SRCI then transported to TRCI where property is reinventoried and property is missing or broken and was only in DOC'S possession.

172 ~~146~~. Doc. prisons have a notable history of losing inmate property and has lost dozens of small claims where plaintiff would normaally bring them but due to Ms. Vincent is not possible denying due process.
Third converion/property claim.

173 ~~147~~. C/O Ransier took all of palintiff's hygene and canteen for Robert King and TRCI did replace most of the hygene only.

174 ~~148~~. Plaintiff had a through item by item inventory over 8 hours at SRCI and then up dated on 10-1-12 and the very familiar to sgt browns done on 7-5-13 and the next was done on 10-17-13 which was poorly done but prior to segragation photo's are taken of plaintiff's property which would prove the loss of property that was only in the prisons possession.

175 ~~149~~. C/o Ransier requested a C/o Evano on 11-2-13 to shake down plaintiff's cell soley looking for canteen stuff but got nothing more than a hygene bag of stuff was in cell.

176 ~~150~~. On 12-31-13 Mr gower's office sent a letter to jeri taylor to investigate property claims but nothing was done.

177 ~~151~~. The items on inventory which were missing was 1 soy sause, 1 BBQ sause, 2 ramon soups, 1 refied beans, 1 tube cheeze, 1 whipper mix, 1 coffee, 3 creamers, 1 peanut butter, 1 cherry drink mix, 7 crystal lites, 6 spices, 1 siam sause, 1 milky way, 1 jelly beans, 2 noxema, 2 afta's, 2 next lotions, dental floss, palmer coco butter, 1 murrys, 3 vitiams totaling 103.63

Forth conversion/property claim.

178 ~~152~~. Plaintiff alleges this is also related to denial of due process related to other 3 claims and in violation of 14th amendment.
PAGE ~~153~~ AMENDED VERIFIED COMPLAINT.

- 179 ~~323~~. State of oregon will claim they are the only perosn that can be named as a defendant per OTCA.
- 180 ~~324~~. THis claim involves 2 tort claims L154490 which involves glasses and 80-90 pencials that are documented.
- 181 ~~325~~. The second tort claim L154363 involves 2 cds and 30+ pages of porn that was taken by c/o Ransier and gave to Robert King.
- 182 ~~326~~. C/oRansier has been invested gated multiple time for inmate staff relationship of which king has bragged that he is on his payroll and spent alot of time together when together on a unit.
- 183 ~~327~~. Jeri Taylor,was aware that there was abuse by staff over plaintiffs property and C/O Ransier.
- 184 ~~328~~. Linda Schutt would intercept all kites to jeri taylor and answer them to circumvent a responce from chain of command which Ms. Schutt is not.
- 185 ~~329~~. Linda Schutt knew and seen evidence that sgt. Primmer had violated the law and made false statements on a tort investigation and had a duty to act on it but she proceeded to retaliate and cover it up
- 186 ~~330~~. Sht. Primmer's failurw to do his job was a dirrect result of plaintiff's 2 cd's and pages of adult content coming up missing.
- 187 ~~331~~. On 1-11-14 plaintiff filed a notice of tort on the 2 cd's and porn pages of adult content and on 4-16--14 plaintiff filed a tort on the glasses and the 80 plus pencials.
- 188 ~~332~~. Lt. Edision seen the plaintiff and said he would give plaintiff 75 envelopes to resolve the 2 cd's and adult pages.
- 189 ~~333~~. Ms. Schutt knew Sgt. Primmer lied in the official investigation and that Lt. Edison tried to cover it up,and other staff confirmed it but nothing was done.
- 190 ~~334~~. Sgt Brown on 5-30-14 confirmed sht. primmer lied in a official investigation on the two cd's and 30+ adult pages
- 191 ~~335~~. In a kite to sgt. olvera dated 6-14-14 told plaintiff he emailed and spoke to lt. edison.
- 192 ~~336~~. State police seen plaintiff over official misconduct of sgt. Primmer and showed plaintiff's tort info and which did not match and did not have all the evidence that plaintiff origionally offered and showed staff misconduct and showed plaointiff information and facts were never sent to risk managment so linda schutt and lt. Edison deleted evidence that showed retaliation,theft,and official
- PAGE ~~33~~ AMENDED VERIFIED COMPLAINT.

misconduct in covering up the criminal conduct.

State Libal Claim

- 193 ~~307~~. Robert king wrote out a conflict report for kurtis mcvae per Lt. Bostons request stateing that king had to do it so it was done right then making a false prea report knowing it to be false as he did it knowing it to be false and would be circulated to dozens of people knowing it was false as he paid mcvae to lie.
- 194 ~~308~~. Robert king wrote prison and captain iverson and said I was interffering in a criminal investigation.
- 195 ~~309~~. Robert King paid micheal mahony to make false statements to SIU investigator Ms. Short to get plaintiff written up on false charges and claimed plaintiff committed criminal activity and also criminal extortion and fraud as was written in micconduct.

SLANDER CLAIM

- 196 ~~310~~. Robert king in late december 2014 and janurary 2015 claims that plaintiff raped Kurtis mcvae and told a unit of 80+ people that plaintiff did this labling him a sex offender/preditor.
- 197 ~~311~~. Robert king also said plaintiff was a rapist and a homosexual knowing it was false and untrue and did so to harm palintiff and cause him anxiety and panick attacks with "IIED".

DEFLAMATION CLAIM

- 198 ~~312~~. Robert King made deflatory statements to doc. and umatilla courts making it public information and knew them to not be true and done so with malice intent to create plaintiff harm.
- 199 ~~400~~. Plaintiff would incorporate and reallege Robert kings paragraphs with in 1 thur 439 to support this claim.
- 200 ~~401~~. Robert King has said doc. has photos of plaintiff with plaintiffs mounth on steven Browns priviates knowing it is not true and is false and now is public information due to his fraudulent actions and lies.and cause plaintiff harassment and sexual harassment.
- 201 ~~402~~. Plaintiff has experienced sexual harassment from his statements and advancements from others.
- 202 ~~403~~. Plaintiff has made a bonified effort to resolve these claims informally and filed timely torts and completely exhausted the grievance system and PLRA.

WHEREFORE, Plaintiff respectfully requests this court to grant the following relief:

- 1 Iverson, Capt Lytle, Lt Young, Lt Boston, Sgt Hager,
- 2 Sgt. Hookins for setting plaintiff up on false charges
- 3 and filing torts, Grievances and civil Actions,
- 4 C. Compensatory Damages ~~jointly and~~ severally
- 5 for 20,000 against Jill Curtis for Her Retaliation
- 6 for Action of Delaying, hinder, grievance investigations
- 7 denial to comply with court order of P.D., Temporary
- 8 with property investigation to deprive plaintiff.
- 9 D. Compensatory Damages jointly and severally for
- 10 5,000" against Lt Edson, Sgt Primmer c/o Ransier.
- 11 Robert King over property Retaliation in is fabricating
- 12 reports, and taking property out of Retaliation.
- 13 E. Compensatory Damages jointly and severally for
- 14 10,000" against ms short, michael mathoney and
- 15 Robert King over conspiring ~~and~~ together to punish
- 16 plaintiff for false misleadnd Report based on civil
- 17 litigation against Robert King in unratified court.
- 18 F. Compensatory Damages severally and jointly against
- 19 Capt Lytle and Lt Young for 10,000" for Retaliating
- 20 against plaintiff for filing a tort claim and putting
- 21 him in Segregation for it.
- 22 G. compensatory damages jointly and severally for
- 23 20,000" for Retaliation for filing civil Actions torts
- 24 and grievances Resulting in denial of treatment of
- 25 adequate medication
- 26 H. injunctive relief against Robert King from ever

1 being allowed around plaintiff or on same housing
2 unit.

3 I impudently relief that all plaintiff's property
4 items lost, taken, or misplaced by staff be replaced
5 with like items from defendant or value.

6 3. for all other costs this court deems just
7 and appropriate

8
9 claim 2 conspiracy to commit 1st Amendment
10 Retaliation

11 A. compensatory damages jointly and severally
12 for \$5,000⁰⁰ against Lt Edison and Sgt primmer
13 in conspiring together, falsely reports as to
14 Doe/ Dae Property/ but investigation to include
15 fabricating a grievance report.

16 B. compensatory damages jointly and severally for
17 15,000⁰⁰ against ms Skurt, michael mahoney, and
18 Robert King in there joint conspiracy to chill his
19 civil litigations by filing a misconduct to harm
20 him violating 1st Amendment protected Right.

21 C. compensatory damages jointly and severally
22 for 5,000⁰⁰ against shannon Vincent and Victor
23 Beerbauer, that conspired to make and file a perjured
24 Declaration in malheur courts to mislead and
25 deny plaintiff due process.

26 D. compensatory damages jointly and severally

1 for 10,000 against Lt Boston and Robert King
 2 who conspired together in drafting a conflict
 3 Report against plaintiff over false prison charges,
 4 & compensatory damages for 20,000⁰⁰ against
 5 Colette Peters, Michael Bower, John Myrick
 6 Capt Pedro, Capt Iverson, Capt Lytle who were
 7 all apart of or aware plaintiff being punished
 8 for filing litigation and bring false misconduct
 9 charges on plaintiff
 10 & compensatory damages for 10,000⁰⁰ severally
 11 against Sgt Wilson for using false evidence
 12 and used hearsay from inmates not reliable and
 13 with zero physical evidence.
 14 6. Injunctive Relief for for DOC and DOJ to
 15 give plaintiff a new 13 inch TV for violating
 16 the previous court order and false Declaration,
 17 H. Injunctive Relief for Capt Lytle, Capt Pedro
 18 Capt. Iverson, Lt Young to be prevented from
 19 putting plaintiff in segregation unless there
 20 is some physical evidence and his actions are - is
 21 a immediate threat to safety and security of facility
 22 I for all other costs this court deems just
 23 and appropriate
 24
 25 claim III 8th Amendment cruel and unusual
 26 punishment - failure to protect.

1 A. Compensatory Damages ~~against~~ jointly and
 2 severally for 20,000⁰⁰ against Michael Lower
 3 Capt pedis, Lt Boston for failing to protect
 4 plaintiff in AD-Seq from violent predators.

5 B. Compensatory Damages jointly and severally
 6 against Lt Boston and Robert King in
 7 conspiring, planning to harm plaintiff from
 8 Dec 2013 thru Jan 2014 for 10,000⁰⁰

9 C. Compensatory Damages severally against
 10 DR Norton for denying plaintiff medication
 11 requested by specialist knowing he was in
 12 pain for 20,000⁰⁰

13 D. Injunctive Relief for DR ~~norton~~ Norton
 14 to put plaintiff on medication to treat his
 15 pain as specialist stated or remove lorryx,
 16 E. for all other costs this court deems
 17 just and appropriate

18
 19 Claim IV 14 Amendment denial of Due
 20 process

21
 22 A. Compensatory Damages jointly and severally
 23 for 10,000⁰⁰ against Shannon Vincent and
 24 Victor Beerkower for filing documents
 25 in case 1406779 knowing them to be
 26 false perjured to deprive plaintiff due

- 1 process and mis lead the courts.
- 2 B. compensatory Damages Severally for 10,000⁰⁰
- 3 against Mr R. Hillmick for Denial of the proces
- 4 of 17 grievance
- 5 C. compensatory Damages Severally for
- 6 15,000⁰⁰ against Jill Curtis for denying the
- 7 process in grievances and losing 3 complaints
- 8 thru prison mailroom.
- 9 D. compensatory Damages for 5,000⁰⁰ against
- 10 Shannon Vincent in having Doc staff Mr
- 11 B. J. Parker to make false Declaration in case
- 12 1205, 94092 confirmed by Sgt. Olvera.
- 13 E. compensatory Damages jointly and severally
- 14 against Lt Boston, Capt Iverson when they
- 15 denied plaintiff the process over false pre
- 16 allegation and seeks 10,000⁰⁰
- 17 F. compensatory Damages jointly and severally
- 18 for 20,000⁰⁰ against Capt. Lytle, Lt R.A. Young
- 19 and Sgt Hagan for denying plaintiff the process
- 20 in failing to view camera footage as informants
- 21 gave a date and time to alleged misconduct.
- 22 Dated 11-22-15
- 23 G. compensatory Damages ~~for~~ against James
- 24 Deacon for 20,000⁰⁰ in denying evidence
- 25 from hearsay informants about bragging on
- 26 setting plaintiff up which is hearing

- 1 misconduct 1511 TRCI 0097 TRCI 25 Dated
- 2 Dated 12-18-15 which Denied Due process
- 3 and failing to get video footage and
- 4 investigation of witnesses.
- 5 H. Compensatory Damages against Capt
- 6 Reda for 2,500⁰⁰ in failing to timely
- 7 assign a person to get video footage
- 8 on misconduct 1511 TRCI 0097 TRCI 25
- 9 on 12-18-15 and waited for it to be taped over.
- 10 I. Compensatory Damages against Lt R.A. Young
- 11 for 5,000⁰⁰ when he Denied Due process when
- 12 he falsified a official Report as to CI motion
- 13 Todd's letter he seen of him bragging on
- 14 setting plaintiff up in January 2016
- 15 J. Compensatory Damages against Capt
- 16 Swensen for 5,000⁰⁰ when he knew motion
- 17 Todd bragged in a letter to plaintiff and
- 18 admitted in a verbatim letter to Hnter.
- 19 Wilson stating plaintiff did not in fact
- 20 get contraband, and failed to correct it
- 21 denying plaintiff Due process.
- 22 K. Compensatory Damages against Shannon
- 23 Vincent for 20,000⁰⁰ when she stepped outside
- 24 the scope of her job duties in filing
- 25 frivolous motion to Revoke when she
- 26 knew he did not qualify and was untimely

1 Resulting in plaintiff having all Umatilla cases
 2 Dismissed in 2015 involving property leaving
 3 him no due process to resolve property claims.
 4 L. Compensatory Damages against James Deacon
 5 for 20,000⁰⁰ for Denying plaintiff due
 6 process in hearing No. 1507 N. 012 N12 on
 7 7-14-15 when He had no evidence except
 8 hearsay and refused plaintiff to call staff
 9 and inmate witnesses and video footage
 10 with an investigation Denying plaintiff
 11 due process

12 M. Compensatory Damages against Sgt Wilken
 13 for 5,000⁰⁰ in failing to do a thorough
 14 investigation for misconduct No 1507 N012
 15 N12 when He failed to get any physical
 16 evidence to support his misconduct such as
 17 camera footage

18 N. Injunctive relief for Shamon Vincent
 19 and Victor Bearbowe to replace plaintiff's
 20 13 inch TV.

21 O. Injunctive relief for TREC to Reverse
 22 and Remand the Heare to produce physical
 23 evidence if any to support claim or
 24 Denies and expunge it.

25
 26 Claim V: Deliberate indifference to 8th
 Amendment.

A. Compensatory Damages jointly and severally
 2 against Dr Norton and Dr Shelton for
 3 denying plaintiff adequate pain medication
 4 for Coccyx and knees being Deliberate
 5 indifferent. Seeking 25,000⁰⁰

6 B. Injunctive relief for Dr Shelton to
 7 approve medications specialist Recommend
 8 or to perform Coccyx Removal and
 9 knee injection shots

10 C. For all other costs and Relief this Court
 11 deems just and appropriate

12
 13 Claim ~~IV~~ VI Intentional infliction of
 14 emotion distress (IIED)

15
 16 A. Compensatory Damages jointly and
 17 severally against Collette Peters, Michael
 18 Bower, Lt Boston, Robert H King for 20,000⁰⁰
 19 for there known abuse and harm to
 20 plaintiff over false misconducts, false prea
 21 Reports causing severe (IIED)

22 B. Compensatory Damages jointly and
 23 severally against Shannon Vincent and
 24 Victor Beerbower for 5,000⁰⁰ for making
 25 plaintiff look like a liar when they filed a
 26 perjured Declaration knowing it to be false

1 and causing plaintiff severe PTSD
 2 C. Compensatory Damages against Michael
 3 Mahoney, Robert H. King, ms Skort in joint
 4 conspiring to harm plaintiff for filing litigation
 5 and writing a false misconduct violating
 6 plaintiff 1st Amendment Rights and seeks
 7 25,000⁰⁰
 8 D. for all other Relief and costs this Court
 9 Deems just and appropriate

10
 11 Claim VII 14 Amendment - equal protection
 12 A. Compensatory Damages against Shannon
 13 Vincent for 25,000⁰⁰ for Denying plaintiff
 14 to Review One process, Abusing her
 15 position, Violating the law to treat plaintiff
 16 unfairly, causing 4 property claims to be
 17 dismissed based on false statements to Wurts
 18 Denying plaintiff equal protection
 19 B. Compensatory Damages jointly and severally
 20 for 25,000⁰⁰ against Colette Peters, Michael
 21 Bower, Lt Young. Capt Pedro in failing
 22 to hold Robert H. King and Kurtis McVae
 23 accountable for false press allegation
 24 and not equally holding all inmates accountable
 25 for misconducts per Rules
 26 C. Compensatory Damages against Ellen

1 Rosenblum and Stannon Vincent ~~for~~ jointly
 2 Severally for 10,000⁰⁰ for knowing abetting
 3 these position violating the Constitution
 4 OSB Ethic, State Laws to hurt, Deprive
 5 and Harm plaintiff when they stepped
 6 outside the scope of their employment
 7 and Violated plaintiff 14 Amendment Rights.
 8 D. Compensatory Damages against Capt
 9 Iversen for 5,000 for taking property
 10 mixing up legal work, and Denying
 11 plaintiff Due process and his property
 12 He took without a Show Down.
 13 E. Injunctive Relief for Capt Iversen to
 14 Replace Any property He took from plaintiff.

15
 16 Plaintiffs Supplemental State tort Claims
 17 Relief Requested.

18
 19 Claim one - Conversion.

20 A. Compensatory Damages against State of
 21 Oregon, Lt McMillen for 20,000 for loss
 22 and Destruction of property that was in
 23 their total control and Domain.

24 B. Injunctive Reliefs that TRES / Lt McMillan
 25 Replace all Canteen items

26 C. for such other Relief this Court Deems

15

1 just and appropriate.

2

3 Claim two - conversion,

4

5 A Compensatory Damages against State
6 of Oregon, ~~for 5,000~~, for 5,000⁰⁰ for
7 all property and legal work lost from
8 SRU to TRU

9 B. Injunctive Relief to Replace all items
10 listed and missing due to their neglect at
11 SEU or TRU. which they had complete
12 control of.

13 C. Such other Relief this Court Deems just
14 and appropriate.

15

16 Claim Three - conversion/Property

17 A. Compensatory damages against the state
18 of Oregon and employees for 500.00 for
19 this claim

20 B. Injunctive Relief to Replace all Items
21 listed as missing for this claim.

22 C. For such other relief this Court deems
23 just and appropriate.

24

25 Claim four conversion/property

26

1 A compensatory damages against the state
 2 of Oregon and employees for both property
 3 issue as there Robbed in staff were part
 4 of public.

5 B Injunctive Relief for All property
 6 to be replaced that is missing
 7 C. Such other Relief the courts deem
 8 just and appropriate

9
 10 state libel claim.

11 A. Compensatory damages against Robert
 12 King for 20,000.00 for pay Kurtis meyer
 13 120⁰⁰ to make false press claims of Rape
 14 against plaintiff and calling him a Homosexual
 15 with Lt Boston Helping it along.

16 B. Compensatory Damages against Robert King
 17 for 20,000⁰⁰ against Robert King for
 18 writing innuendo courts and making public
 19 record stating plaintiff was investigated
 20 for fraud, extortion, postal fraud, in a
 21 letter to judge Hill which hurt cases

22 C. Compensatory Damages against Michael
 23 Mahony and Robert King jointly and
 24 severally in conspiring and executing false
 25 allegation against plaintiff knowing them
 26 to be false to his detriment to manipulate

1 a misconduct and is seeking 25,000⁰⁰
 2 for these actions.
 3 D. For such other relief the court deems
 4 fit and appropriate.

6 Defamation Claim

7 A. Compensatory damages severally for
 8 25,000⁰⁰ against Robert King for several
 9 defamatory statements done with malice
 10 and hatred to caused plaintiff severe "IBED"
 11 that he made false statements to Doc staff,
 12 unatilla courts, state law agencies, federal
 13 postal service knowing they were false
 14 to create fear and intimidation & "IBED"
 15 which has done for past 10 years

17 Dated this 24th day February 2016

19 Robert Woodruffe^H 5631215
 20 82911 Beach Acres Rd
 21 unatilla Oregon 97862

22 I Robert Woodruffe, pursuant to 28 USC 1741
 23 verify and state under penalty of perjury
 24 this complaint is true and correct.
 25 Dated this 24th day of February 2016

26 Robert Woodruffe

CERTIFICATE OF SERVICE

CASE NAME: Woodhoffs v. State of Oregon et al

CASE NUMBER: (if known) CV02390-SI

COMES NOW, Robert Woodhoffs, and certifies the following:

I am incarcerated by the Oregon Department of Corrections at Two Rivers Correctional Institution, Umatilla, OR.

That on the 23 day of September, 20 16, I personally placed in the Correctional Institution's mailing service a TRUE COPY of the following:

Second Amended Verified Complaint

I placed the above in a securely enclosed, postage prepaid envelope, to the person(s) named at the places addressed below:

Number of copies (1) to:

Dept of Justice
1162 Central St. NE
Salem Oregon
97301

Number of copies () to:

Number of copies () to:

Number of copies () to:

Robert Woodhoffs
(Signature)
Print Name Robert Woodhoffs
SID# 5031215
Two Rivers Correctional Institution
82911 Beach Access Rd
Umatilla, OR 97882